



ENTRUST

SECURING A WORLD IN MOTION

June 21, 2024

To the CA/B Forum Community,

Thank you for all the comments and feedback to date. In reviewing the questions and comments from the community members regarding the June 7 report, it is clear there is a desire for more details and specificity around root causes and action plans. While we wait for Mozilla's comments, attached is the revised report addressing the feedback and questions posted on MDSP. As more comments come in, we commit to addressing them in revised reports.

We want to begin by acknowledging to the root programs and the community that we have not successfully fulfilled all the commitments we made to you in 2020. This has resulted in several instances where we did not comply with the CA/B Forum and root program policies. With respect to the recent issues, we acknowledge that these incidents did not get reported and communicated in the appropriate way with the CA/B forum. Our initial stance of not revoking the impacted certificates was incorrect.

We are disappointed as this does not represent Entrust values and falls short of the standards we set for ourselves. We also want to make sure it is understood that none of these lapses have been malicious or done with ill-intent to make the internet less secure. As a global CA we must walk a tightrope in balancing the requirements of the root programs and subscriber needs, especially for critical infrastructure. In some cases, we did not strike the right balance.

We are committed to making lasting organizational and cultural changes to fix this and to begin to regain the trust of the root programs and the community.



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We are making several changes to ensure appropriate investment allocation and governance of compliance work. A few concrete examples:

1. Changes to product line leadership and organizational reporting have been implemented.
2. Immediate 100% increase in compliance resourcing for this product line.
3. All compliance work, budget and resources for this product line are now aligned with our corporate compliance organization, which operates independently of this business and is responsible singularly for managing the process of auditing and meeting our corporate wide regulatory and compliance obligations (now including this product line).
4. Similarly, all operational work, budget and resources for this product line are now aligned with our corporate digital operations organization, which also operates independently of this business and is responsible for managing the operational rigor needed to deliver on compliance obligations, incident management/response and remediation process and tasks.
5. Corporate oversight will be put in place to ensure prioritization of investment to achieve 2020 (and future) commitments. This includes quarterly review at Entrust Compliance Governance board of progress on commitments, investment allocation as needed and confidential executive sessions with staff to ensure visibility and transparency.

We are confident that the new leadership model, increased investment, and oversight will deliver on the commitments we made in 2020, others we are making now, and the ones we make in the future. To show our commitment, we will be publicly tracking the progress on improvements listed in Appendix 2 of our updated report. Our intent is that this may aid other CAs in learning from our experience and improving their operations and culture.

Sincerely,

Bhagwat Swaroop

Bhagwat Swaroop
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